

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAMRAN KHODAKHAH,

Plaintiff,

v.

MONTEFIORE MEDICINE ACADEMIC HEALTH
SYSTEM, INC., ALBERT EINSTEIN COLLEGE OF
MEDICINE, GORDAN TOMASELLI, PABLO
CASTILLO, BRYEN JORDAN, and JOHN-JANE
DOES 1-10,

Defendants.

No. 1:24-cv-00839-LAK-RFT

**NOTICE OF DEFENDANTS MONTEFIORE MEDICINE ACADEMIC HEALTH
SYSTEM, INC., ALBERT EINSTEIN COLLEGE OF MEDICINE, PABLO CASTILLO,
AND BRYEN JORDAN’S MOTION TO DISMISS THE FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants Montefiore Medicine Academic Health System, Inc. (“Montefiore”), Albert Einstein College of Medicine (“Einstein”), Dr. Pablo Castillo, and Dr. Bryen Jordan’s Motion to Dismiss the First Amended Complaint, the Declaration of Gabrielle E. Tenzer, and the exhibits attached thereto, Defendants Montefiore, Einstein, and Drs. Castillo and Jordan, by and through their counsel, will move this Court, before the Honorable Robyn. F. Tarnofsky, United States Magistrate Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the First Amended Complaint as against Defendants Montefiore, Einstein, and Drs. Castillo and Jordan with prejudice.

Respectfully submitted,

Dated: November 15, 2024

By: 

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Albert Einstein College of Medicine, Pablo
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